

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Sara M. Keenan		Chapter 13 Proceeding
Wells Fargo Bank, N.A.	Debtor(s)	20-14061-AMC
vs. Sara M. Keenan	Movant	Hearing:
and Scott F. Waterman	Respondents	

**OBJECTION TO CONFIRMATION OF THE PLAN**

Wells Fargo Bank, N.A. (Movant), a secured creditor in this case objects to the confirmation of the Debtor's Chapter 13 plan and states the following:

1. The plan does not provide for the secured creditor, Wells Fargo Bank, N.A. to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on October 13, 2020, Movant is the holder of a secured claim in the amount of \$117,276.73 secured by the Debtors' property located at 8716 Macon Street, Philadelphia, PA 19152-1513.
3. On or about November 10, 2020, Movant filed a Proof of Claim listing the arrears to be paid through the plan at **\$13,021.66**. See **Exhibit "A"** attached hereto and made a part hereof.
4. Debtor's Plan proposes to pay Movant **\$1,000.00** in pre-petition arrears, which is insufficient to provide for Movant's arrearage claim. See **Exhibit "B"** attached hereto and made a part hereof.
5. If the plan is confirmed, the Movant may suffer irreparable injury, loss and damage.

Respectfully submitted,

**/s/ Sarah K. McCaffery, Esquire**  
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Dated: 12/15/2020